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CATHERINE R. McCABE
Commissioner

December 21, 2018

CERTIFIED MAIL/RRR
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Paul Lasek
Bloomfield Water Department
One Municipal Plaza
Bloomfield, NJ 07003

**RE: Recommended Actions for Newark Water Department's Consecutive Systems
Bloomfield Water Department
PWSID No. NJ0702001
Letter No. LCR180004**

Dear Paul Lasek:

The purpose of this letter is to recommend specific actions that Bloomfield Water Department (Bloomfield) should consider implementing because it purchases water from the Pequannock Gradient of the Newark Water Department (Newark) (PWSID NJ0714001). Pursuant to 40 C.F.R. § 141, Newark currently has a lead action level exceedance (ALE), a Maximum Contaminant Level (MCL) violation for Total Haloacetic Acids (HAA5s), and elevated Total Trihalomethane (TTHM) levels at several locations within its system.

Additionally, in early October of 2018, the New Jersey Department of Environmental Protection (DEP) was informed that new data collected by Newark demonstrated that the chemical used to control corrosion within their Pequannock Gradient is no longer effective and that the protective lining of the lead service lines is sloughing off, potentially carrying lead particles in the drinking water to consumers' taps. Newark submitted a draft corrosion control study report to the DEP, which recommended Newark switch its corrosion control inhibitor to address this issue; however, Newark must further evaluate their treatment system and conduct additional sampling and studies.

In the meantime, Newark has issued a public notification providing additional guidance on reducing one's exposure to lead and are providing point of use (POU) filters to those customers that may be affected as an interim measure as described on their website, <https://www.newarklead serviceline.com/>, and on the DEP's website, <https://www.nj.gov/dep/watersupply/>.

In accordance with the Federal Lead and Copper Rule (LCR) at 40 C.F.R. § 141.80 et seq., the DEP completed a technical review of Newark's consecutive systems. Within this letter are the DEP's findings and recommendations specific to Bloomfield.

Bloomfield Findings

- Bloomfield only has a distribution system with no treatment, no storage, and receives all of its water from Newark's Pequannock Gradient.
- Lead ALEs occurred in Bloomfield during 2017, for the triennial monitoring period of January 1, 2015 through December 31, 2017, and in 2018, for the semi-annual monitoring period of January 1, 2018 through June 30, 2018.
- The Bloomfield distribution system consists of lead service lines and lead interior plumbing materials, both Tier 1 site classifications pursuant to 40 C.F.R. § 141.86. There are 130 known lead service lines based on Bloomfield's Lead and Copper Sampling Plan, which was conditionally approved on September 5, 2018.
- The DEP approved Bloomfield's Lead and Copper Sampling Plan with the condition that Bloomfield complete a materials evaluation for its entire distribution system by September 5, 2020.
- Bloomfield exceeded the MCL for HAA5 every quarter from the 1st quarter of 2017 through to present, i.e., (3rd quarter of 2018).
- Bloomfield exceeded the MCL for TTHMs during the 3rd quarter of 2018. Seven TTHM MCL violations were previously incurred during 2011, 2012, 2015, and 2016.

Lead Recommendations

Based on the information the DEP currently knows about the ineffectiveness of Newark's corrosion control treatment in the Pequannock Gradient, Newark's sampling data, and the fact that DEP does not have detailed data, demonstrating whether the corrosion control treatment is effective within Bloomfield, DEP strongly recommends the following actions be taken by Bloomfield as soon as practicable for the protection of the public health:

Public Education/Public Notification

- Provide public education, in addition to the ongoing public education required pursuant to 40 C.F.R. § 141.85(a) and (b), to customers with known lead service lines, lead interior plumbing materials, those customers suspected of having either, and/or individual lead sample results greater than the lead action level of 15 parts per billion (ppb).
- In the public education materials, address the following:
 - Flushing may not reduce lead levels in drinking water for those with lead service lines and that those customers with lead service lines or with unknown service lines should consider using bottled water or a POU filter that is approved to reduce lead certified by National Sanitation Foundation (NSF) International until further notice.
 - Flushing is still an effective means of reducing exposure for those without a lead service line, i.e., internal pipes and fixtures with lead-containing materials.
- Prior to the POU filters being installed, for those with known or unknown lead service lines, the New Jersey Department of Health recommends that bottled water be used for infants who are being fed with formula, and for all children under the age of six.
- Provide information on how customers can have their water tested.
- Note that the New Jersey Department of Health recommends that children under the age of six have their blood lead levels screened as soon as possible regardless of previous

blood lead testing history by their primary health care provider and include information on how testing can be done for free by the local health department for those without insurance.

- Provide an overview of Newark's corrosion control treatment and the potential impacts on the Bloomfield water supply.

Materials Evaluation

- Complete a materials evaluation of the entire distribution system as set forth in 40 C.F.R. § 141.86(a) on an expedited schedule despite the September 5, 2020 deadline set forth in the September 5, 2018 Lead and Copper Sampling Plan approval. The materials evaluation shall be completed through a thorough records reviews, public outreach efforts, and inspections. Bloomfield should consider revising its materials evaluation strategy and outline a plan for an expedited process to complete the evaluation and submit it to the DEP for technical assistance.

Water Testing

- Offer water quality testing for lead to its customers.

Coordination with Newark

- Coordinate with Newark to evaluate potential impacts to Bloomfield's system from proposed changes to Newark's corrosion control treatment and disinfection treatment processes, including additional water quality parameter monitoring, sequential sampling, and conducting a demonstration study in accordance with EPA's *Corrosion Control Treatment Evaluation Technical Recommendation for Primacy Agencies and Public Water Systems*, dated March 2016.

Additional information pertaining to the recommendations above may be found on the Division's website at <https://www.nj.gov/dep/watersupply/dwc-lead-public.html>.

TTHM & HAA5 Recommendations

- Bloomfield should continue to evaluate remedial measures to address its own disinfection byproduct issues while working closely with Newark. Bloomfield's Remedial Measures Report submitted for the 3rd quarter 2018 HAA5 & TTHM violations will be addressed under a separate letter.

Remedial measures undertaken to address a particular contaminant can adversely affect other contaminants within the treatment train and/or distribution system. The United States Environmental Protection Agency prepared a guidance document, *Simultaneous Compliance Guidance Manual for the Long Term 2 and Stage 2 DBP Rules*, to assist water systems that need to address multiple contaminants within their water system. This guidance manual can be accessed at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=60000E2Q.txt>.

It is recommended all communications/notifications concerning issues in this letter involve both Newark and the DEP.

To ensure adequate communication and coordination between Newark and Bloomfield, the DEP is requesting a written response to this letter from Bloomfield to be submitted electronically to watersupply@dep.nj.gov **on or before January 11, 2019**. In addition, Bloomfield shall provide

an update on the materials evaluation in its response, including an update on the number of known lead service lines within Bloomfield's service area.

Your prompt attention to this matter is both necessary and appreciated. Note that it is possible additional information and/or action may be necessary as both the Federal and State Safe Drinking Water programs continue to assess the implementation of the Federal Lead and Copper Rule to ensure the continued protection of public health.

If you have any questions regarding the above, please contact Laura Scatena at 609-292-2957 or by email at laura.scatena@dep.nj.gov. When contacting the DEP please reference the PWSID No. 0702001 and Letter No. LCR180004.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia L. Gardner". The signature is fluid and cursive, with the first name "Patricia" being more prominent than the last name "Gardner".

Patricia L. Gardner
Director, Division of Water Supply & Geoscience

cc: Northern Bureau of Water Compliance and Enforcement
Jerry Notte, Licensed Operator, Newark Water Department
Kareem Adeem, Acting Director of Public Works, Newark Water Department
Linda Ofori, Bureau Chief, Bureau of Water System Engineering